UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 Honorable Robert B. Kugler, District Court Judge
This Document Relates to All Actions	

ORDER

The Court held a status conference with the parties on December 14, 2022, and directed the parties to submit a proposed order entering the Amended Personal Injury Plaintiff's Fact Sheet and identifying the plaintiffs who must complete the Amended Personal Injury Plaintiff's Fact Sheet.

WHEREFORE, it is hereby ORDERED that the attached Amended Personal Injury Plaintiff's Fact Sheet, which adds losartan and irbesartan claims, shall be the operative version of the Personal Injury Plaintiff's Fact Sheet. *See* CMO No. 16, Doc. No. 249.

It is further ORDERED that all personal injury plaintiffs who have filed a short-form complaint before entry of this Order but who have not already filed a valsartan-only PFS and completed the Show Cause Process shall have ninety (90)

days from the entry of this order to complete the Amended Personal Injury Plaintiff's Fact Sheet. Personal injury plaintiffs who are bringing claims involving multiple sartans who have already filed a valsartan-only PFS and who have completed the Show Cause Process will complete a yet to be determined Losartan/Irbesartan PFS Addendum. All other personal injury plaintiffs shall complete the Amended Personal Injury Plaintiff's Fact Sheet sixty (60) days after filing their short-form complaint.

Signed this 20th day of January, 2023.

s/ Thomas I. Vanaskie
Hon. Thomas I. Vanaskie (Ret.)
Special Master

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION **This Document Relates to:** **DATED: _____**	MDL No. 2875 Honorable Robert B. Kugler, District Judge Honorable Thomas I. Vanaskie Special Master

AMENDED PLAINTIFF'S FACT SHEET FOR INDIVIDUAL PERSONAL INJURY CASES

This Fact Sheet must be completed by each plaintiff who has filed a lawsuit related to the use of Valsartan, Losartan, and Irbesartan products by a plaintiff claiming personal injuries due to use of Valsartan. Please answer every question to the best of your knowledge. In completing this Fact Sheet, you are under oath and must provide information that is true and correct to the best of your knowledge. If you cannot recall all of the details requested, please provide as much information as you can. You must supplement your responses if you learn that they are incomplete or incorrect in any material respect. For each question, where the space provided does not allow for a complete answer, please attach additional sheets so that all answers are complete. When attaching additional sheets, clearly label to what question your answer pertains. Please do not leave any blank spaces; if a question does not apply, respond "N/A."

In filling out this form, please use the following definitions: (1) unless otherwise specified, "Plaintiff," "you," and "your" refer to the individual alleged to have sustained injuries and/or damages as a result of his or her ingestion of valsartan, lostartan, and/or irbestartan; (2) **"health care provider"** means any hospital, clinic, medical center, physician's office, infirmary, medical or diagnostic laboratory, provider of telemedical services, whether real-time telemedicine, remote patient monitoring, or store-and-forward service, or other facility that provides medical, dietary, psychiatric, or psychological care or advice, and any pharmacy, weight loss center, x-ray department, laboratory, physical therapist or physical therapy department, rehabilitation specialist, physician, psychiatrist, osteopath, homeopath, chiropractor, psychologist, nutritionist, dietician, or other persons or entities involved in the evaluation, diagnosis, care, and/or treatment of the plaintiff or plaintiff's decedent; (3) **"document"** means any writing or record of every type that is in your possession, including but not limited to written documents, documents in electronic format, cassettes, videotapes, photographs, charts, computer discs or tapes, and x-rays, drawings, graphs, phone- records, non-identical copies, and other data compilations from which information can be obtained and translated, if necessary, by the respondent through electronic devices into reasonably usable form; (4) "Valsartan" means any Valsartan -containing product, including but not limited to Valsartan, Amlodipine/Valsartan, Valsartan/Hydrochlorothiazide (HCTZ), and/or Amlodipine/Valsartan/Hydrochlorothiazide (HCTZ); (5) "**Losartan**" means any Losartan-containing product, including but not limited to Losartan and/or Losartan/Hydrochlorothiazide (HCTZ); (6) "**Irbesartan**" means any Irbesartan-containing product, including but not limited to Irbesartan and/or Irbesartan/Hydrochlorothiazide (HCTZ); (7) "Complaint" means the operative complaint filed in your case, whether an original or amended or subsequent complaint.

Information provided by plaintiff will only be used for purposes related to this litigation. This Fact Sheet is completed pursuant to the Federal Rules of Civil Procedure governing discovery (or, for state court cases, the governing rules of the state in which the case is pending) and Case Management Order [ ] ("CMO-__").

I. CORE CASE INFORMATION

A. Please provide the following information for the civil action which you filed:

Caption:	
Court and Docket No. (and MDL Docket No. if different):	
Plaintiff's Attorney, Law Firm, Address, Phone Number, and Email Address:	
Date Lawsuit Filed:	
Jurisdiction where suit would have been filed (if direct filed into MDL):	
Defendants against whom you are bringing claims for Valsartan:	
Defendants against whom you are bringing claims for Losartan:	
Defendants against whom you are bringing claims for Irbesartan:	

B. Please provide the following information for the Plaintiff/Decedent on whose behalf this action was filed, and for any spouse of the Plaintiff/Decedent:

Plaintiff/Decedent First Name:		Last Name:	
Address:		City:	
State:		Zip Code:	
Date of Birth:		Gender:	
Social Security Number: (including past SSNs, if applicable):		All other names by which Plaintiff has been known (including, but not limited to maiden, prior married, nicknames, and aliases):	

Spouse First Name:		Spouse Last Name:	
Spouse Address:		Spouse City:	
Spouse State:		Spouse Zip Code:	
Spouse Date of Birth:		Spouse Gender:	
Spouse Social Security Number: (including past SSNs, if applicable):		All other names by which Spouse has been known (including, but not limited to maiden, prior married, nicknames, and aliases):	

C. Primary Language if other than English: _____

D. **Valsartan.** Please provide the following information regarding your usage of Valsartan products.

1. ☐ Check here if you, or the Decedent if completing as an estate representative, did not ingest a valsartan product (i.e., only ingested losartan or irbesartan).

   If you checked the box above, skip the remaining questions in this section and move on to Part E.

2. I have in my possession records demonstrating use of Valsartan, Amlodipine/Valsartan, Valsartan. Hydrochlorothiazide (HCTZ), and/or Amlodipine/Valsartan/ Hydrochlorothiazide (HCTZ).

   Yes ☐ No ☐

3. If yes, you must attach copies of the prescription and/or pharmacy records demonstrating product use.

4. I have in my possession prescription bottles, labels, and/or photographs of prescription bottles or labels demonstrating product use.

   Yes ☐ No ☐

   If yes, you must attach any copies or photographs of prescription bottles or labeling in your possession for products that you claim are at issue.

Identify product(s) and set forth for each, in chronological order from earliest to most recent. Please add fields as necessary to capture all products.

	First Product	**Second Product**	**Third Product**	**Fourth Product**
Select Product:	Choose an item.	Choose an item.	Choose an item.	Choose an item.
Dosage:				
NDC Code (if known):				
Lot Number (if known):				
Batch Number (if known):				
API Manufacturer (if known):				
Labeler/Distributor (if known):				
Repackager (if known):				
Start Date:				
End Date:				
Reason for being prescribed				

Name and Address of Prescribing Physician:				
Name and Address of Pharmacy(ies):				
Check if you have records demonstrating Product ID:				
Check if you are seeking damages in this litigation based on your usage of this product:				

E. **Losartan.** Please provide the following information regarding usage of Losartan products.

1. ☐ Check here if you, or the Decedent if completing as an estate representative, did not ingest a losartan product (i.e., only ingested valsartan or irbesartan) or the person who ingested VCDs/LCDs/ICDs did not ingest LCDs.

   If you checked the box above, skip the remaining questions in this section and move on to Part F.

2. I have in my possession records demonstrating use of Losartan, Losartan/Hydrochlorothiazide (HCTZ).

   Yes ☐ No ☐

3. If yes, you must attach copies of the prescription and/or pharmacy records demonstrating product use.

4. I have in my possession prescription bottles, labels, and/or photographs of prescription bottles or labels demonstrating product use.

   Yes ☐ No ☐

   If yes, you must attach any copies or photographs of prescription bottles or labeling in your possession for products that you claim are at issue.

Identify product(s) and set forth for each, in chronological order from earliest to most recent. Please add fields as necessary to capture all prescriptions.

	First Prescription	**Second Prescription**	**Third Prescription**	**Fourth Prescription**
Select Product:	Choose an item.	Choose an item.	Choose an item.	Choose an item.
Dosage:				
NDC Code (if known):				
Lot Number (if known):				
Batch Number (if known):				
API Manufacturer (if known):				
Labeler/Distributor (if known):				
Repackager (if known):				
Start Date:				
End Date:				
Reason for Prescription:				
Name and Address of Prescribing Physician:				

Name and Address of Pharmacy(ies):				
Check if you have records demonstrating Product ID:				
Check if you are seeking damages in this litigation based on your usage of this product:				

F. **Irbesartan.** Please provide the following information regarding usage of Irbesartan products.

1. ☐ Check here if you, or the Decedent if completing as an estate representative, did not ingest an irbesartan product (i.e., only ingested valsartan or losartan).

   If you checked the box above, skip the remaining questions in this section and move on to Part G.

2. I have in my possession records demonstrating use of Irbesartan and/or Irbesartan/Hydrochlorothiazide (HCTZ).

   Yes ☐ No ☐

3. If yes, you must attach copies of the prescription and/or pharmacy records demonstrating product use.

4. I have in my possession prescription bottles, labels, and/or photographs of prescription bottles or labels demonstrating product use.

   Yes ☐ No ☐

   If yes, you must attach any copies or photographs of prescription bottles or labeling in your possession for products that you claim are at issue.

5. Identify product(s) and set forth for each, in chronological order from earliest to most recent. Please add fields as necessary to capture all prescriptions.

	First Prescription	Second Prescription	Third Prescription	Fourth Prescription
Select Product:	Choose an item.	Choose an item.	Choose an item.	Choose an item.
Dosage:				
NDC Code (if known):				
Lot Number (if known):				
Batch Number (if known):				
API Manufacturer (if known):				
Labeler/Distributor (if known):				
Repackager (if known):				
Start Date:				
End Date:				
Reason for Prescription:				
Name and Address of Prescribing Physician:				
Name and Address of Pharmacy(ies):				
Check if you have records demonstrating Product ID:				
Check if you are seeking damages in this litigation based on your usage of this product:				

IF YOU DID NOT CHECK THE BOX INDICATING YOU HAVE RECORDS DEMONSTRATING PRODUCT ID FOR ANY OF THE DRUGS LISTED ABOVE, YOU MUST CERTIFY AS FOLLOWS (check <u>all</u> that apply):

I certify that I have made reasonable, good faith efforts to identify the manufacturer of the Valsartan, Losartan, and/or Irbesartan product(s) used in my treatment: ☐

If certifying the above, please describe your reasonable, good faith efforts:

_____

_____

_____

I certify that I have requested records from:

Pharmacy, ☐

Prescribing physician, ☐ **and/or**

Health insurance provider; ☐

and the manufacturer either remains unknown at this time ☐

or I am awaiting the records. ☐

G. Please provide the following information regarding your alleged injury.

YOU MUST ATTACH MEDICAL RECORDS IN YOUR POSSESSION DEMONSTRATING ALLEGED INJURY

Set forth for each cancer you claim as a result of taking Valsartan, Losartan, and/or Irbesartan:

Date of Diagnosis of Primary Cancer:			
Select Primary Cancer Type:	Choose an item.	Choose an item.	Choose an item.
Specify Other Cancer (if Applicable):			
Highest Stage Diagnosed:			
Metastasis of Cancer to other Organs? (Yes/No)	Choose an item.	Choose an item.	Choose an item.
Remission Date (if applicable):			
Description of Treatment:			
Date(s)/types of each surgery, if applicable:			
Oncologist(s):			
Surgeon(s):			

H. If you are completing this questionnaire in a representative capacity (e.g., on behalf of the estate of a deceased person), please complete the following:

Name:	
Address:	
Capacity in which you are representing the individual:	
If you were appointed as a representative by a court state the State, Court and Case Number and attach supporting documentation:	
Relationship to the Represented Person:	
State the date and place of death of the decedent (if applicable):	

If you are completing this questionnaire in a representative capacity, please respond to the remaining questions with respect to the person whose medical treatment involved the use of Valsartan, Losartan, and/or Irbesartan. Those questions using the term "you" refer to the person whose treatment involved the use of Valsartan, Losartan, and/or Irbesartan. If the individual is deceased, please respond as of the time immediately prior to his or her death unless a different time period is specified.

II. PERSONAL INFORMATION

Provide the following information for Plaintiff. If completing as an estate representative, provide the information as to Decedent unless otherwise specified.

A. Estate Representative Information [if applicable]

If you are completing this questionnaire in a representative capacity *(e.g.,* on behalf of the estate of a deceased person), please complete the following:

Your Name:	
Address:	
Capacity in which you are representing the individual:	
If you were appointed as a representative by a court, identify the the State, Court and Case Number and attach supporting documentation:	
Relationship to the represented person:	
State the date and place of death of the decedent (if applicable):	

If you are completing this questionnaire in a representative capacity, please respond to the remaining questions with respect to the person whose medical treatment involved the use of Valsartan, Losartan, and/or Irbesartan, unless otherwise indicated that you should provide information on your own behalf. Questions using the term "you" refer to the person whose treatment involved the use of Valsartan, Losartan, and/or Irbesartan unless otherwise specified. If the individual is deceased, please respond as of the time immediately prior to his or her death unless a different time period is specified.

B. Background Information

1. Medicare Health Insurance Claim Number (if applicable): _____

2. Current address (or most recent address, if responding on behalf of a Decedent) and date when you began living at this address:

_____

_____

_____

3. Identify each address at which you have resided during the last ten (10) years and the approximate dates during which you lived at each address (most recent first). If responding on behalf of a Decedent, provide Decedent's addresses for the last ten years prior to death:

_____

_____

_____

4. Do you have a driver's license? Yes ☐

If yes, state of issuance: _____; DL Number:_____.

C. Family Information

1. Have you (or has Decedent, if completing as an estate representative) ever been married?

Yes ☐ No ☐

If yes, for each spouse, state the spouse's name, the date of marriage, the date the marriage ended, the nature of termination *(e.g.,* death, divorce, etc.), and that spouse's present address:

Spouse's Name	Date of Marriage	Date Marriage Ended	Nature of Termination	Spouse's Present Address

2. Has your spouse filed a loss of consortium or other claim in this lawsuit?

Yes ☐ No ☐

Child's Name	Address	Date of Birth

D. Educational History

Provide the following information regarding your (or Decedent's, if completing as an estate representative) educational background, beginning with high school. Identify each high school and including, but not limited to trade or, vocational schools, colleges, universities or other post-secondary educational institutions you attended, the institution's address, the dates of attendance, and the diplomas or degrees awarded:

Name of School	Address	Dates of Attendance	Diploma/Degree Awarded

E. Employment History

Whether or not you are making a lost wage claim, please respond to all questions in this section except as noted (if completing as an estate representative, provide the information as to Decedent):

1. Are you currently employed? Yes ☐ No ☐

If yes, identify your current employer with name, address and telephone number and your title/position there:

_____

2. Please identify each of your employers over the past ten (10) years, including the dates of such employment and positions held (most recent first). If you were self-employed during the relevant time, please also include the relevant information (you only need to supply rate of pay or salary if you are making a lost wage claim in this lawsuit):

Employer and Type of Business	Address	Title or Position	Dates of Employment	Pay Rate / Salary

3. Have you been on leave or otherwise absent from a job for more than thirty (30) consecutive days for reasons related to your health in the past ten (10) years? If completing on behalf of a Decedent, respond as to the ten years prior to Decedent's death.

Yes ☐ No ☐

If yes, please state the dates, employer, and the health condition causing your absence from work:

_____

_____

4. Have you been unemployed for more than thirty (30) consecutive days for reasons related to your health in the past five (5) years? If completing on behalf of a Decedent, respond as to the five years prior to Decedent's death.

Yes ☐ No ☐

5. *If yes,* please state the dates, employer, and the health condition causing your inability to work:

_____

6. To your knowledge have you had regular exposure to (select all that apply):

Exposure to:	**Type/Frequency**	**Dates of Exposure**
Cadmium (i.e., battery production, cadmium mining)	Occupational ☐ Other ☐	
Coal industry	Occupational ☐ Other ☐	
Diet includes red and/or processed meats	Approximately ___ meals per week	
Diet includes smoked foods, salted meat and fish, and/or pickled vegetables	Approximately ___ meals per week	
Metal industry (i.e., steel facilities, smelting)	Occupational ☐ Other ☐	
Organic solvents (i.e., trichloroethylene, perchloroethylene, methylene chloride)	Occupational ☐ Other ☐	
Pesticides (includes herbicides)	Occupational ☐ Other ☐	
Radiation (i.e., therapeutic radiation, thorotrast radiography, nuclear industry work)	Occupational ☐ Other ☐	
Rubber industry	Occupational ☐ Other ☐	
Vinyl chloride	Occupational ☐ Other ☐	

F. Military Service

Have you ever served in any branch of the military? Yes ☐ No ☐

1. *If yes,* branch and dates of service:

_____

If yes, highest rank: _____

If yes, military occupational specialty ("MOS"):

_____

If yes, were you discharged for any reason relating to your health (whether physical, psychiatric, or other health condition)? Yes ☐ No ☐

If yes, state the health condition:

_____

_____

_____

2. Have you ever been rejected from military service for any reason relating to your health (whether physical, psychiatric, or other health condition)?

Yes ☐ No ☐

If yes, state the health condition:

_____

_____

_____

G. <u>Worker's Compensation and Disability Claims</u>

Have you (or Decedent) ever filed for worker's compensation related to a claim of occupational exposure to a carcinogenic substance, or for social security and/or state or federal disability benefits for any reason?

Yes ☐ No ☐

If yes, please then as to each application, separately state the following:

Year claim was filed: _____

Where claim was filed: _____

Claim/docket number, if applicable: _____

To what government agency or company did you submit your application: _____

Nature of claimed injury:_____

Period of disability:_____

Amount awarded: _____

Was claim denied? Yes ☐ No ☐

[Attach additional sheets as necessary to describe more than one claim.]

H. **Life Insurance:** Within the last ten (10) years, have you ever been denied life insurance based on health reasons?

Yes ☐ No ☐

If yes, please state when, the name of the life insurance company, and the company's stated reason for denial (if any):

_____

_____

I. **Other Lawsuits:** Have you personally, and/or has Decedent, if applicable, ever been a party to a personal injury lawsuit, other than in the present suit?

Yes ☐ No ☐

If yes, state: (1) nature of the case (2) the state and county in which claim was filed, (3) the caption, case name and/or names of adverse parties, (4) the civil action or docket number assigned to each such claim, action or suit, (5) attorney who represented you, (6) a description of the nature of your claim, (6) the current status of the claim, (7) the amount of damages or compensation received (unless subject to protective order or confidentiality agreement) and if completing as an estate representative (8) whether the party(ies) was you, Decedent, or both.

_____

_____

_____

_____

J. **Convictions:** Have you, Plaintiff, and/or has Decedent, if applicable, ever been convicted of, or pled guilty (or no contest) to a felony and/or a crime involving fraud or dishonesty?

Yes ☐ No ☐

If yes, please provide the following information for each such conviction/guilty plea: (l) the crime or offense, (2) the state and county in which you were convicted or pled guilty or no contest, (3) the date on which you were convicted or pled guilty or no contest, (4) the sentence or other outcome, and if completing as an estate representative (5) whether the defendant was you or Decedent.

Crime or Offense	State and County Where Proceedings Took Place	Date of Conviction, Guilty or No Contest Plea	Sentence or Other Outcome	Defendant (Plaintiff or Decedent)

K. **Computer Use:** Have you, Plaintiff, and/or has Decedent, if applicable, had access to a computer at any time during the past five (5) years?

Yes ☐ No ☐ Unsure ☐

If yes, then answer the following:

1. Did you personally (Plaintiff, including estate representative Plaintiffs) visit within the past five years any website containing information regarding Valsartan, Losartan, and/or Irbesartan impurities with NDMA or other potentially carcinogenic substances?

   Yes ☐ No ☐ Do Not Recall ☐

   If yes, identify the websites and the dates viewed:

   _____

   _____

   _____

   _____

   If answering as an estate representative, provide answer the same question as to Decedent:

   Yes ☐ No ☐ Do Not Know or Recall ☐

   If yes, identify the websites and the dates viewed:

   _____

   _____

   _____

   _____

2. Did you personally (Plaintiff, including estate representative Plaintiffs) communicate in the past ten (10) years via email, visit any chat rooms, or publicly post a comment, message

or blog entry on a public internet site regarding your health, Valsartan, Losartan, and/or Irbesartan? (You should include all postings on public social network sites including Twitter, Facebook, MySpace, Linkedln, or "blogs" where the general public may post such comments).

Yes ☐ No ☐ Do Not Recall ☐

If yes, please state where and when you made such public posts and the substance of what was posted.

_____

_____

_____

_____

If answering as an estate representative, provide answer below to same question as to Decedent:

Yes ☐ No ☐ Do Not Know/Recall ☐

If yes, identify the websites and the dates viewed:

_____

_____

_____

L. **Bankruptcy:** Have you (or has Decedent, if completing as an estate representative) or your spouse ever filed for bankruptcy?

Yes ☐ No ☐

If yes, please state when and in what court you filed your bankruptcy petition, including the docket number of the petition and the date of the orders of discharge, if any:

Date Bankruptcy Filed	Court in Which Bankruptcy Was Filed	Docket Number	Discharge Date (if applicable)

III. CLAIM INFORMATION

Provide the following information for Plaintiff. If completing as an estate representative, provide the information regarding Decedent unless otherwise specified.

A. Hypertension

1. When were you first diagnosed with hypertension and what was your initial course of treatment?

2. If you discontinued Valsartan, Losartan, or Irbesartan products, was it due to the recall or for other reasons (if other reasons, state the reasons)?

3. If you discontinued Valsartan, Losartan, or Irbesartan products, how have you managed or treated your hypertension?

B. Valsartan/Losartan/Irbesartan Usage

1 Are you currently taking:

a. Valsartan, Amlodipine/Valsartan, Valsartan/Hydrochlorothiazide (HCTZ), and/or Amlodipine/Valsartan/Hydrochlorothiazide (HCTZ)?

Yes ☐ No ☐

b. Losartan and/or Losartan/Hydrochlorothiazide (HCTZ)?

Yes ☐ No ☐

c. Irbesartan and/or Irbesartan/Hydrochlorothiazide (HCTZ)?

Yes ☐ No ☐

2. Have you ever received any samples of any Valsartan, Losartan, and/or Irbesartan product?

Yes ☐ No ☐ Do Not Recall ☐

If yes, please state the following: (1) who gave you the sample(s); (2) when the sample(s) were provided; and (3) how many sample(s) you received:

Product	Physician/Clinic/Individual Who Provided Samples	When Samples Were Provided	How Many Samples You Received

3. Were you ever given any written instructions, including any prescriptions, packaging, package inserts, literature, medication guides, or dosing instructions, regarding any Valsartan, Losartan, and/or Irbesartan product?

Yes ☐ No ☐ Do Not Recall ☐

If yes, please (1) state the product regarding which you received the materials and (2) describe the documents if you no longer have them. Please respond separately for each product. If you have the documents, please produce them or make them available for inspection.

_____

_____

_____

_____

_____

4. Were you given any oral instructions regarding your use of Valsartan, Amlodipine/Valsartan, Valsartan/Hydrochlorothiazide (HCTZ), and/or Amlodipine/Valsartan/Hydrochlorothiazide (HCTZ), Losartan and/or Losartan/Hydrochlorothiazide (HCTZ), or Irbesartan and/or Irbesartan/Hydrochlorothiazide (HCTZ)?

   Yes ☐ No ☐ Do Not Recall ☐

   If yes, for each product, identify each person who gave you the oral instructions and describe what he or she told you:

_____

_____

_____

_____

5. Do you have in your possession, or does your attorney have, the container or packaging from the Valsartan, Losartan, and/or Irbesartan product(s) you allege to have used?

   Yes ☐ No ☐

   If yes, who currently has custody of the container or packaging?

_____

_____

_____

6. Have you ever seen any advertisements (e.g., in magazines or television commercials) for any Valsartan, Losartan, and/or Irbesartan product? If completing as an estate representative, please provide this information as to yourself and the Decedent, to the extent known, and specify below whether Plaintiff or Decedent saw the advertisement or commercial if applicable.

   Plaintiff/Estate Representative: Yes ☐ No ☐ Do Not Recall ☐

   Decedent (if applicable): Yes ☐ No ☐ Do Not Know/Recall ☐

   If yes, for each advertisement or commercial, state the product advertised, the nature and content of the advertisement or commercial, and approximately when you (or Decedent) saw the advertisement or commercial:

_____

_____

7. Other than through your attorneys, have you had any communication, oral or written, with any of the Defendants or their representatives regarding the Valsartan, Losartan, and/or Irbesartan recall? If completing as an estate representative, please provide this information as to yourself and the Decedent, to the extent known, and specify whether the communication was by Plaintiff or Decedent, if applicable.

Yes ☐ No ☐ Do Not Recall: ☐

If yes, please identify:

Date of Communication:_____

Method of Communication:_____

Name of Defendant/Representative:_____

Substance of communication:

_____

_____

_____

C. **Non-Cancer Physical Injuries:** For each non-cancer physical injury claimed, please provide the following information:

1. Describe the nature of your physical injury, illness, or disability:

_____

_____

_____

2. When did this/these physical injury(ies) first occur?

_____

_____

_____

a. Have you ever been hospitalized as a result of this/these physical injury(ies)?

If yes, please provide the following information:

i. Approximate date(s) of hospital admission:_____

ii. Approximate date(s) of discharge: _____

iii. Hospital name(s) and address(es): _____

3. Procedures and/or Treatments:

a. Identify the primary treating physician(s) for the physical injuries you claim in this case:

Name of Healthcare Provider	Address and Phone Number	Approx. Date(s) of Treatment

b. Identify any medications prescribed to treat the physical injuries you claim in this case and identify the prescribing healthcare provider:

_____

_____

_____

_____

_____

c. Did you receive any treatment other than medication? Yes ☐ No ☐

If yes, describe the treatment below:

_____

_____

_____

d. Please list all major hospitalizations, surgeries, and/or procedures for *non-cancer injuries* you attribute to Valsartan, Losartan, or Irbesartan.

Condition	Treatment/Procedure	Date(s) of Treatment/ Procedure	Medical Provider / Facility for Treatment/Procedure

4. At the time you were diagnosed with the injury(ies) you attribute to your use of Valsartan, Losartan, and/or Irbesartan, were you undergoing treatment that lasted for a minimum of 6 months for any other medical conditions? If so, describe each other medical condition, and the treatment.

_____

_____

_____

5. At the time you were diagnosed with the injury(ies) you attribute to your use of Valsartan, Losartan, and/or Irbesartan, what other prescription and over the counter medications were you taking, that you took for a minimum of 6 months?

_____

_____

_____

D. **Ongoing Injuries:** Does any injury, illness, or disability you attribute to the Valsartan, Losartan, and/or Irbesartan persist today? Yes ☐ No ☐

If yes, identify the current symptoms, the medication or treatment you continue to receive, the health care provider(s) providing treatment, and that health care provider's address:

Current symptoms: _____

_____

Medications currently taking: _____

_____

Other treatments currently receiving: _____

_____

Treating provider: _____

_____

Address: _____

E. **Emotional Injury:** Are you claiming a diagnosed mental and/or emotional injury as a result of the use of Valsartan, Losartan, and/or Irbesartan? If completing as an estate representative, please respond to as to any emotional mental and/or emotional injury allegedly experienced by Decedent.

Yes ☐ No ☐

1. *If yes,* what diagnosed mental and/or emotional injury do you claim resulted from the use

of Valsartan, Losartan, and/or Irbesartan?

_____

_____

_____

_____

_____

_____

2. *If yes,* for each healthcare provider (including but not limited to primary care physicians, psychiatrists, psychologists, and/or counselors) from whom you have sought treatment for diagnosed psychological, psychiatric, or emotional injuries as a result of Valsartan, Losartan, and/or Irbesartan, state the following:

Name and Address	Condition Treated	Date(s) Treated	Medications Prescribed

F. **Lost Wages:** Do you claim that you lost wages or suffered impairment of earning capacity as a result of any condition you allege was caused by Valsartan, Losartan, and/or Irbesartan?

Yes ☐ No ☐

1. *If yes,* state the period or periods involved, and the total amount of time you have lost from work as a result of any condition you claim was caused by Valsartan, Losartan, and/or Irbesartan.

_____

_____

_____

2. If yes, state your annual gross income you derived from your employment for each of the five (5) years prior to the injury or condition you claim was caused by Valsartan, Losartan, and/or Irbesartan.

Year	Annual Gross Income

3. If yes, state the annual gross income for every year following the injury or condition you claim was caused by Valsartan, Losartan, and/or Irbesartan.

Year	Annual Gross Income

4. If yes, state the total amount of income you claim you lost as a result of any condition you claim was caused by Valsartan, Losartan, and/or Irbesartan:

$_____

G. **Medical Expenses:** Please list all of your medical expenses, including amounts billed or paid by insurers and other third-party payors, which are related to any condition which you claim was caused by Valsartan, Losartan, and/or Irbesartan for which you seek recovery in the action which you have filed.

Provider	Date	Expense

1. Have you had any discussions with any doctor or other healthcare provider about: (1) whether Valsartan, Losartan, and/or Irbesartan caused or contributed to your injury;

Yes ☐ No ☐ Do Not Recall ☐

and/or (2) other causes of your injury?

Yes ☐ No ☐ Do Not Recall ☐

If completing as an estate representative, check "yes" if either you or decedent have had such discussions and identity below who had the discussion(s).

If yes, please identify:

Name of health care provider: _____

Address: _____

_____

_____

_____

Date of discussion: _____

_____

_____

What were you told? (Describe discussion regarding Valsartan, Losartan, and/or Irbesartan and/or other causes of your injury):

_____

_____

_____

[If discussed with more than one doctor, please answer for each doctor, using additional pages as necessary.]

H. **Other Damages:** Are you claiming any other unique or specialized economic damages (e.g., tuition for specialized education, alterations to home to accommodate disability) as a result of any condition you allege was caused by Valsartan, Losartan, and/or Irbesartan? If yes, please describe each:

_____

_____

_____

_____

_____

I. **Witnesses:** Please identify all persons *other than healthcare providers* who you believe possess information concerning your injury and/or your current medical condition. For each person, please state their name, address, phone number, relationship to you, and the information you believe they possess (attach additional sheets as necessary).

Name	Address and Phone Number	Relationship	Information Witness May Possess

IV. LIST OF HEALTHCARE PROVIDERS

A. **Healthcare Providers:** (Excluding Mental Health Care Providers, unless you are claiming damages related to a diagnosed mental health condition)

1. Identify each physician, doctor, or other health care provider, including providers of telemedical services, whether real-time telemedicine, remote patient monitoring, or store-and-forward service, who has provided treatment to you for hypertension or cancer, or primary care, or who you use as a primary care provider (for non-primary care specialists used as a primary care provider, so indicate in the table below) in the past ten (10) years and the reason for consulting the health care provider, to the extent not set forth above regarding treatment of hypertension or mental health care (attach additional sheets as necessary).

Name and Medical Specialization	Address and Phone Number	Approximate Dates	Reason for Consultation	Check if Current Healthcare Provider
				☐
				☐
				☐
				☐
				☐
				☐
				☐
				☐
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				☐

B. **Hospitals, Clinics, and Other Facilities:** To the extent not listed in Part IV.A above, identify each hospital, clinic, surgery center, physical therapy or rehabilitation center, or other healthcare facility where you have received inpatient or outpatient treatment (including emergency room treatment) that you attribute to the injuries claimed herein (attach additional sheets as necessary):

Name	Address and Phone Numbers	Approximate Dates	Reason for Treatment

C. **Pharmacies:** Identify each pharmacy, drugstore, and/or other supplier (including mail order) where you have had prescriptions filled or from which you have received any prescription medication in the past ten (10) years (attach additional sheets as necessary):

Name of Pharmacy	Address and Phone Number of Pharmacy	Approximate Dates

D. **Insurance Carriers:** Identify each health insurance carrier that provided you with medical coverage and/or pharmacy benefits for the last ten (10) years, and the policy number (attach additional sheets as necessary).

Carrier	Policy Number	Approximate Dates of Coverage

V. MEDICAL BACKGROUND

A. Height and weight at the time your first alleged Valsartan, Losartan, and/or Irbesartan-related cancer was diagnosed:

Height:_____Weight:_____

B. Height and weight at the time your alleged Valsartan, Losartan, and/or Irbesartan-related cancer was in remission (if applicable):

Height:_____Weight:_____

C. Current Weight (or weight at death): _____

D. Tobacco Use History:

Did you use tobacco, including cigarettes, cigars, pipes, chewing tobacco/snuff, and/or e-cigarettes at any time?

Yes ☐ No ☐

If you answered *yes*, please identify the types of tobacco used and the amount used. If you used tobacco products intermittently or used different tobacco products at different times, provide this information separately for each approximate period of usage:

Types of tobacco used: ☐ cigarettes ☐ cigars ☐ e-cigarettes

☐ pipes ☐ chewing tobacco/snuff

Date tobacco use started:_____ Date tobacco use ceased:_____

Amount used: on average,_____per day for _____ years

Additional periods of usage (if no, continue to section E):

Yes ☐ No ☐

Additional periods of usage, if applicable:

Types of tobacco used: ☐ cigarettes ☐ cigars ☐ e-cigarettes

☐ pipes ☐ chewing tobacco/snuff

Date tobacco use started:_____ Date tobacco use ceased:_____

Amount used: on average,_____per day for _____ years

Types of tobacco used: ☐ cigarettes ☐ cigars ☐ e-cigarettes

☐ pipes ☐ chewing tobacco/snuff

Date tobacco use started:_____ Date tobacco use ceased:_____

Amount used: on average,_____per day for _____ years

_____

_____

_____

E. Alcohol Use History

1. Do you currently drink or have you drunk alcohol (beer, wine, whiskey, etc.)?

   *If yes, p*lease check which of the following represents your typical alcohol consumption in the ten (10) years leading up the date on which you first experienced any symptoms you believe are related to your alleged injury(ies):

   ☐ 1-2 drinks per week

   ☐ 3-6 drinks per week

   ☐ 7-10 drinks per week

   ☐ 10 or more drinks per week

   ☐ Other - explain:_____

   Type of Alcohol Consumed:_____

   _____

F. Have you been diagnosed with, or treated for any of the following in the past ten (10) years? If so, for each condition for which you answer yes, please provide the additional information requested below:

Condition	Yes	No	Unknown
Cancer of any type prior to Valsartan/Losartan/Irbesartan use other than the cancers alleged above (including, but not limited to, lung, colon, liver, breast, kidney, skin, stomach, testicular, leukemia, Hodgkin's disease, or Non-Hodgkin's lymphoma)			
Celiac Disease			
Cirrhosis			
Colon polyps			
Common variable immunodeficiency (CVID)			
Persistent Constipation			
Diagnosed and Treated Depression/ Anxiety			

Condition	Yes	No	Unknown
Diabetes			
Persistent Diarrhea			
Encephalitis			
Epstein-Barr virus			
Gallbladder disease			
Gastrointestinal bleeding			
Genetic condition(s) (list all)			
Gluten sensitivity or intolerance			
Hepatic dysfunction or active liver disease			
Hemochromatosis			
Hepatitis B virus			
Hepatitis C virus			
H. pylori			
Human immunodeficiency virus (HIV)			
Human papillomavirus			
Hyperlipidemia			
Hypertension (High Blood Pressure)			
Hypotension (Low Blood Pressure)			
Intestinal obstruction			
Increased C-Reactive Protein (CRP) levels			
Inflammatory Bowel Disease			
Irritable Bowel Syndrome			
Jaundice			
Kidney Problems (disease, infections, stones, protein in urine, etc.)			
Liver dysfunction			
Liver tumor			
Malabsorption			
Persistent Nausea			
Non-cancerous tumors			
Diagnosed Obesity			
Pancreatic cysts			

Condition	Yes	No	Unknown
Pancreatic insufficiency			
Pulmonary Embolism /blood clot in lung			
Refractory celiac disease			
Renal Insufficiency			
Retinal bleed			
Stomach ulcers/Peptic ulcers (requiring surgery)			
Stomach polyps			
Stroke of any type (hemorrhagic, ischemic, etc.)			
Transient Ischemic Attack (TIA)			
Typhoid fever			
Ulcerative Colitis			
Sudden, substantial weight loss			
Persistent Vomiting			

G. For each condition for which you answered yes in the previous chart, please provide the information requested below (attach additional sheets as necessary).

Condition	Name, Address, and Phone Number of Treating Health Care Provider	Approximate Date of Onset	Treatment Received and Outcome

H. **Non-Claimed Cancers:** Set forth for each cancer you *do not claim* was caused by your use of Valsartan, Losartan, and/or Irbesartan:

Date of Diagnosis of Primary Cancer:			
Select Primary Cancer Type:	Choose an item.	Choose an item.	Choose an item.
Specify Other Cancer (if Applicable):			
Highest Stage Diagnosed:			
Metastasis of Cancer to other Organs? (Yes/No)	Choose an item.	Choose an item.	Choose an item.

Remission Date (if applicable):			
Description of Treatment:			
Date(s)/types of each surgery, if applicable:			
Oncologist(s):			
Surgeon(s):			

I. Please list all major hospitalizations, surgeries, and/or procedures you have undergone in the last 10 years:

Treatment/Procedure	Reason for Treatment/Procedure	Date(s) of Treatment/ Procedure	Medical Provider / Facility for Treatment/Procedure

VI. MEDICATIONS

A. In the ten (10) years prior to when you first took Valsartan, Losartan, and/or Irbesartan, list any additional prescription medications you took on a regular basis (more than three (3) consecutive months):

Name of Prescription Medication	Prescribing Healthcare Provider(s)	Approximate Dates/Years Taken	Dosage and Frequency of Use	Reason for Prescription	Name and Address of Pharmacy

B. For the three (3) year period before the onset of the injuries for which recovery is sought in this action, set forth: (a) the name of each and every over the counter or non-prescription drug product that you regularly or consistently took (including all vitamins, nutritional supplements, and all herbal and homeopathic medications and remedies); (b) the prescribing/recommending physician (if any); (c) the approximate dates/years taken; (d) the dosage ingested and frequency of use; (e) the purpose for using each such product; and (f) the pharmacy or store where the product was purchased.

Name of Over the Counter or Non-Prescription Drug Product	Healthcare Provider(s) Who Recommended the Product, if Applicable	Approximate Dates/Years Taken	Dosage and Frequency of Use	Reason For Use	Pharmacy/Store Where Purchased

VIII. FAMILY MEDICAL HISTORY

1. Please indicate, to the best of your knowledge, whether your children, parents, siblings, or grandparents have ever had any cancer diagnosis or treatment:

Family Member Name	Relationship to You	Primary Cancer Type	Age at Diagnosis	Date of Diagnosis	Treatment and Outcome

IX. FRAUD CLAIMS

1. Are you claiming fraud or consumer fraud in this action on the basis of Plaintiff-specific allegations other than those set forth in the Master and Short Form Complaints?

   Yes ☐ No ☐

   If yes, please answer the following questions:

2. What representation(s) do you claim was falsely or fraudulently made and to whom was it made?

   _____

   _____

   _____

3. By whom?

   _____

   _____

   _____

4. How was it made?

   _____

   _____

   _____

5. When was the alleged representation(s) made? Identify approximate date(s).

   _____

6. Were these representations in writing? Yes ☐ No ☐

7. If the representations were in writing, did you retain and currently have the original or a copy of those representations? Yes ☐ No ☐

X. DECEASED INDIVIDUALS AND AUTOPSY INFORMATION

A. Are you completing this Fact Sheet on behalf of an individual who is deceased?

Yes ☐ No ☐

If yes, please state the following from the Death Certificate of the individual, and attach a copy of the letter of administration.

(NOTE: In lieu of the following, please attach a copy of the death certificate.)

Date of death:_____

Place of death:_____

Facility or location where death occurred: _____

_____

Name of physician who signed death certificate: _____

Cause of death: _____

B. Are you completing this fact sheet on behalf of an individual who is deceased and on whom an autopsy was performed?

Yes ☐ No ☐

If yes, please attach a copy of the autopsy report.

C. Are you claiming wrongful death as a result of the use of Valsartan, Losartan, and/or Irbesartan?

Yes ☐ No ☐

XI. DOCUMENT DEMANDS

A. **AUTHORIZATIONS** [To be served within twenty (20) days after service of the Plaintiff Fact Sheet ("PFS")]

1. **Health Care Authorizations** - For each primary health care provider, specialist used as a primary health care provider, and each health care provider who diagnosed or treated the injuries attributed to the Valsartan, Losartan, and/or Irbesartan products identified in the PFS, please provide a completed and signed (but undated) Health Care Authorization in the form attached as **Exhibit "A."**

2. **Tax Return 4506 and 4506-T IRS Forms**

   a) Only if you answered "Yes" to question III.F and are asserting a claim for lost wages or a reduction in earning capacity, please provide a completed and signed IRS Form 4506 and 4506-T attached as **Exhibit "B"** for each year identified in your answer to question III.F, and for the immediately preceding five (5) calendar years.

   b) If you answered "No" to question III.F in the PFS and are not asserting a wage loss claim or a reduction in lost earning capacity, you are not required to provide IRS Form 4506 or 4506-T.

3. **Authorizations for the Release of Employment Records**

   a) Only if you answered "Yes" to question III.F and you are asserting a claim for lost wages or a reduction in or loss of earning capacity, please provide a completed and signed (but undated) Employment Authorization in the form attached as **Exhibit "C."**

   b) If you answered "No" to question III.F in the PFS and are not asserting a wage loss claim or a reduction in lost earning capacity, you are not required to provide an Employment Authorization.

4. **Authorization for Release of Worker's Compensation Records**

   Only if you answered "Yes" to question II.F in the PFS and have previously applied for Worker's Compensation related to a claim of occupational exposure to a carcinogenic substance, please provide a completed and signed (but undated) Authorization for Release of Workers' Compensation Records for each government agency or employer company you submitted your application to in the last ten (10) years in the form attached as **Exhibit "D."**

   a) If you answered "No" to question II.F in the PFS you are not required to provide Release of Workers' Compensation Records.

5. **Authorization for Release of Disability Records**

   Only if you answered "Yes" to question II.F in the PFS and have previously applied for Disability benefits, please provide a completed and signed (but undated) Authorization for Release for each government agency or company you submitted your application to in the last ten (10) years in the form attached as **Exhibit "E.**"

a) If you answered "No" to question II.F in the PFS you are not required to provide Release of Disability Records.

6. **Insurance Records Authorization** - For each company listed in your response to question IV.D in this Fact Sheet, please provide a completed and signed (but undated) Authorization for Release of Insurance Records in the form attached as **Exhibit "F."**

7. **Authorizations for Release of Records of Treatment of Behavioral or Mental Health Conditions**.

a) Only if you answered "Yes" to question III.E and are asserting a claim for a diagnosed emotional or mental injury, please provide a completed and signed (but undated) Health Care Authorization in the form attached as **Exhibit "G."**

b) If you answered "No" to question III.E in the PFS and are not asserting an Emotional Injury claim, you are not required to provide Release of Mental Health Care Authorization.

B. OTHER RELEVANT DOCUMENTS DEMANDS

Requests for documents in your possession or the possession of your lawyers, including writings on paper or in electronic form (if you have any of the following materials in your custody or possession or the possession of your lawyers). Please indicate by answering "Yes" or "No" which documents you have, and attach a copy of each of those you have to this Plaintiff Fact Sheet with your responses to the questions above. Unless otherwise specified, "you" is intended to encompass Plaintiff, Plaintiff's counsel, and Decedent, if applicable:

1. All non-privileged documents you reviewed that assisted you in the preparation of the answers to this Plaintiff Fact Sheet.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

2. A copy of all medical and pharmacy records in your possession relating to the use of Valsartan, Losartan, and/or Irbesartan, and relating to the treatment of any condition you claim is related to the use of Valsartan, Losartan, and/or Irbesartan from any hospital or health care provider who treated you in the past fifteen (15) years, including, but not limited to, all imaging studies of any part of your body, and laboratory, test results, pathology reports, and biopsy reports, that relate in any manner to the diagnosis, treatment, care, or management of your condition and the injuries alleged in your complaint.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

3. All x-rays, CT scans, MRIs or other radiographic images of any part of your body.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

4. All laboratory, pathology and biopsy reports and results of same.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

5. All documents, including but not limited to, personal or professional letters, diaries, calendars, journals, logs, date books, video or audio tapes or other documents, materials or things of Plaintiff's or any member of Plaintiff's family, relating to or reflecting your use of any prescription drug or medication in the past ten (10) years.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

6. All product use instructions, product warnings, package inserts, medication guides, pharmacy handouts, or other materials distributed with or provided to you in connection with your use of Valsartan, Losartan, and/or Irbesartan.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

7. If you have been the claimant or subject of any workers' compensation, social security, or other disability proceeding related to your ingestion of any Valsartan, Losartan, or Irbesartan products, all documents relating to such a proceeding.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

8. Copies of advertisements or promotions for Valsartan, Losartan, and/or Irbesartan, which you saw before or while you were using those products, and articles discussing Valsartan, Losartan, and/or Irbesartan which you read before or while you were using those products, including but not limited to, legal advertisements related to the recalls of those products or this litigation.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

9. Copies (or photos were applicable) of the packaging, including the container/packaging and label for Valsartan, Losartan, and/or Irbesartan (plaintiffs or their counsel must maintain the originals of the items requested in this subpart).

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

10. All documents relating to your purchase of Valsartan, Losartan, and/or Irbesartan including, but not limited to, receipts, prescriptions, prescription records, containers, labels, or records of purchase.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

11. All documents known to you and in your possession which mention Valsartan, Losartan, and/or Irbesartan, or any alleged health risks or hazards related to Valsartan, Losartan, and/or Irbesartan in your possession at or before the time of the injury alleged in your Complaint, other than legal documents, documents provided by your attorney, or documents obtained or created for the purpose of seeking legal advice or assistance.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

12. All documents in your possession or in the possession of anyone acting on your behalf (not your lawyer) obtained directly or indirectly from any of the Defendants regarding the Valsartan, Losartan, or Irbesartan recalls.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

13. All documents constituting any communications or correspondence between you and any representative of the Defendants regarding the Valsartan, Losartan, or Irbesartan recalls.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

14. All photographs, drawings, journals, slides, videos, DVDs or any other media, including any "day in the life" videos, photographs, recordings, or other media that you may utilize to demonstrate damages relating to your alleged injury.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

15. Any and all documentation of Plaintiff's and Decedent's, where applicable, use of social media, Internet postings, or other electronic networking website (including, but not limited to, Facebook, MySpace, Linkedin, Google Plus, Windows Live, YouTube, Twitter, Instagram, Pinterest, blogs, and Internet chat rooms/message boards) relating to the recalls of Valsartan, Losartan, and/or Irbesartan, or any of your claims in this lawsuit.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

16. Copies of all documents you (and not your lawyer) obtained from any source relating to the contamination or recall of Valsartan, Losartan, and/or Irbesartan including but not limited to legal advertising materials relating to the recalls of those products or this litigation.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

17. If you claim you have suffered a loss of earnings or earning capacity, your federal tax returns for each of the five (5) years preceding the injury you allege to be caused by Valsartan, Losartan, and/or Irbesartan, and every year thereafter or W-2s for each of the five (5) years preceding the injury you allege to be caused by Valsartan, Losartan, and/or Irbesartan and every year thereafter.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

18. If you claim any loss from medical expenses, copies of all bills from any physician, hospital, pharmacy or other health care providers.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

19. Copies of all records of any other expenses allegedly incurred as a result of the injuries alleged in the complaint.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

20. All public statements made by or on behalf of you relating to this litigation in your possession.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

21. Copies of letters testamentary or letters of administration relating to your status as a representative of a living or deceased plaintiff (if applicable).

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

22. Decedent's death certificate and autopsy report (if applicable).

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

23. All bankruptcy petitions and orders of discharge (if applicable) for all bankruptcy claims made by you or your spouse since the date of your first use of Valsartan, Losartan, and/or Irbesartan.

Responsive Documents Attached ☐

I have no documents responsive to this request ☐

XII. DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that all of the information provided in this Plaintiff Fact Sheet dated _____is true and correct to the best of my knowledge, information and belief formed after due diligence and reasonable inquiry, that I have supplied all the documents requested in Part XI of this Plaintiff Fact Sheet, to the extent that such documents are in my possession or in the possession of my lawyers, and that I have supplied/will supply all applicable Authorizations attached to this declaration, in accordance with the terms of this Plaintiff Fact Sheet.

Further, I acknowledge that I have an obligation to supplement the above responses if I learn that they are in some material respects incomplete or incorrect.

_____ _____

Plaintiff's Name (Signature) Date

_____

Plaintiff's Name (Printed)